

## REMARKS

Applicant recognizes the restriction requirement and acknowledges the withdrawn claims. In the Office Action, the Examiner rejected 22-49 under 35 USC §103. These objections and rejections are fully traversed below.

The claims have been amended to correct minor informalities and to further clarify the subject matter regarded as the invention. Claims 22-36, 38-40, 42-45, and 47-49 remain pending.

Reconsideration of the application is respectfully requested based on the following remarks.

### REJECTION OF CLAIMS 22-49

In the Office Action, the Examiner rejected claims 22-49 under 35 USC §103(a) as being unpatentable over DaCosta et al, U.S. Patent No. 6,826,553 B1, ('DaCosta' hereinafter) in view of Shigemi et al, U.S. Patent No 6,279,006 B1, ('Shigemi' hereinafter). This rejection is fully traversed below.

The pending claims include two different sets of claims. Claims 22-35 relate to generating a structured organization and collaterally generating a description of how the semi-structured data is stored under the structured organization. Conversely, claims 36-49 relate to generating a semi-structured data organization for a collection of structured data and collaterally generating a description of correspondence between the generated semi-structured data organization and the collection of structured data.

DaCosta discloses a system for providing database functions for multiple Internet sources. The Examiner cites col. 2, lines 1-3 and col. 15, lines 9-11 and 51-56 of DaCosta. The Examiner asserts that DaCosta discloses generating a structured organization to store a collection of semi-structured data. DaCosta does disclose a data location and extraction tool.

Col. 2, lines 1-3. As disclosed in DaCosta, the data (e.g., HTML) is converted into a tabular form. See col. 15, lines 51-56.

The Examiner admits that DaCosta does not explicitly teach collaterally generating a description of how the semi-structured data is stored under the structured organization, wherein the description of how the semi-structured data is stored in the structured organization tracks the semi-structured data and includes storage location information of the structured organization.

The Examiner seeks to cure the deficiencies of DaCosta with Shigemi. The Examiner cites col. 7, lines 15-27 and Fig. 3, element 10 of Shigemi. Specifically, col. 7, lines 15-27 recite “[s]imilarly, each script of an operation description 13m associated with a contents description 12c is clearly associated with elements of the contents description 12c. The contents description 12c can be manipulated from the operation description 13m by, for example, issuing an instruction to the structure managing means using a locator description such as an Xpointer.”

Fig. 3, element 10 of Shigemi shows a management object holding means 10, which includes an operation description 13. The operation description 13 is associated with a contents model 11 and a contents description 12. In the Abstract, the contents model is described as defining an internal structure of a contents description. The contents description describes data to be managed according to the contents model. An operation description is coupled to the contents model and manipulates data in the contents description depending on the structure of the data in the contents description. See Abstract.

Shigemi does disclose managing the structure of a contents description according to a contents model. However, Shigemi neither discloses nor suggests tracking how semi-structured data is stored in a structured organization in the manner claimed. In fact, Shigemi fails to disclose or suggest tracking how semi-structured data is stored in a structured organization in any fashion. As such, Applicant respectfully submits that Shigemi fails to cure the deficiencies of the primary reference. Accordingly, the combination of the cited references would fail to achieve the desired result.

Moreover, DaCosta relates to providing database functions for multiple Internet sources. See Title. The Examiner cites FIG. 5 and the associated disclosure of DaCosta. However, FIG. 5 of DaCosta merely shows a mechanism for recording the structural space

based on a document's hierarchy and a contents space based on the document's text. In other words, this information merely represents the semi-structured data.

It is important to note that the data that is extracted in DaCosta is displayed in an organized format. See col. 2, lines 5-8. In other words, the data is converted into tabular form for display purposes only. As a result, it is unnecessary to track how the semi-structured data is stored in the structured organization. As such, DaCosta teaches away from combining the cited references to track how the semi-structured data is stored in the structured organization.

As set forth above, with respect to claim 22, as amended, neither of the cited references, separately or in combination, discloses or suggests a description of how the semi-structured data is stored in a structured organization that tracks hierarchical information of the semi-structured data and includes storage location information of the structured organization, where the storage location information of the structured organization identifies a first and a second storage location in the structured organization of a parent and a child node of a parent and child node pair of the semi-structured data. As such the combination of the cited references would fail to achieve the desired result. Claims 23-35 are patentable for similar reasons.

The converse argument is also applicable here. The cited references, separately or in combination, fail to disclose or suggest the generation of a semi-structured organization and a correlation between the semi-structured organization and data obtained from a structured organization in the manner claimed.

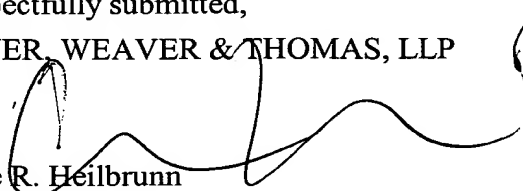
Based on the foregoing, it is submitted that the independent claims are patentable over the cited references. In addition, it is submitted that the dependent claims are also patentable for at least the same reasons. The additional limitations recited in the independent claims or the dependent claims are not further discussed as the above-discussed limitations are clearly sufficient to distinguish the claimed invention from the cited references. Thus, it is respectfully requested that the Examiner withdraw the rejection of the claims under 35 USC §103.

## **SUMMARY**

An early Notice of Allowance is earnestly solicited. If there are any issues remaining which the Examiner believes could be resolved through either a Supplemental Response or an Examiner's Amendment, the Examiner is respectfully requested to contact the undersigned attorney at the telephone number listed below.

Applicants hereby petition for an extension of time which may be required to maintain the pendency of this case, and any required fee for such extension or any further fee required in connection with the filing of this Amendment is to be charged to Deposit Account No. 50-0388 (Order No. ACTUP008X1).

Respectfully submitted,  
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